

Stephen E. Hart, Esq. (*pro hac vice* application pending)  
Texas Bar No. 793911

**JACKSON LEWIS P.C.**  
717 Texas Avenue, Suite 1700  
Houston, Texas 77002  
(713) 568-7866  
Email: [stephen.hart@jacksonlewis.com](mailto:stephen.hart@jacksonlewis.com)

Joshua A. Sliker, Esq.  
Nevada Bar No. 12493  
Amanda Patanaphan, Esq.  
Nevada Bar No. 15080  
**JACKSON LEWIS P.C.**  
300 South Fourth Street, Suite 900  
Las Vegas, Nevada 89101  
Tel: (702) 921-2460  
Email: [joshua.sliker@jacksonlewis.com](mailto:joshua.sliker@jacksonlewis.com)  
Email: [amanda.patanaphan@jacksonlewis.com](mailto:amanda.patanaphan@jacksonlewis.com)

*Attorneys for Defendant  
Tapestry (Nevada), Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ELIZABETH VOGT, an individual,

Plaintiff,

vs.

TAPESTRY (NEVADA) INC., a Foreign  
Corporation.

Defendant.

Case No. 2:24-cv-02232-GMN-BNW

**STIPULATION AND ORDER TO SET  
ASIDE DEFAULT, DISMISS  
DEFENDANT'S MOTION TO SET  
ASIDE CLERK'S ENTRY OF  
DEFAULT (ECF NO. 13) AS MOOT,  
AND EXTEND DEADLINE FOR  
DEFENDANT TO RESPOND TO  
PLAINTIFF'S (ERRATA TO)  
COMPLAINT**

**(FIRST REQUEST)**

IT IS HEREBY STIPULATED by and between Plaintiff Elizabeth Vogt, ("Plaintiff"), by and through her counsel, Hatfield & Associates, Ltd., and Defendant, Tapestry (Nevada), Inc., ("Defendant"), by and through its counsel, the law firm of Jackson Lewis P.C., that pursuant to FRCP 55(c), the Default in the above-captioned matter which was entered by the Clerk on February 27, 2025, will be set aside and Defendant's pending Motion to Set Aside Clerk's Entry of Default

1 will be dismissed as moot. It is further stipulated that Defendant shall have an extension up to and  
2 including April 4, 2025, in which to file its Answer to Plaintiff's Complaint. This Stipulation is  
3 submitted and based upon the following:

4 1. Plaintiff filed her Complaint (ECF No. 1) on December 2, 2024, in the United States  
5 District Court, District of Nevada, Case No. 2:24-cv-02232-GMN-BNW. Plaintiff then filed an  
6 Errata to the Complaint (ECF No. 7) on December 4, 2024.

7 2. Pursuant to Affidavit of Service (ECF No. 11) filed on February 10, 2025, Plaintiff  
8 served Defendant with process on January 16, 2025, making a response due February 6, 2025.

9 3. Plaintiff's counsel filed the Affidavit of Service (ECF No. 11) on February 10, 2025,  
10 and filed the Motion for Entry of Clerk's Default (ECF No. 12) the same day. The Clerk submitted  
11 Entry of Default (ECF No. 13) on February 27, 2025.

12 4. Defendant's counsel recently received this case and were made aware of the Default.  
13 Upon being made aware, Defendant's counsel immediately filed a Motion to Set Aside Clerk's  
14 Entry of Default (ECF No. 14) on March 17, 2025. Defendant's counsel also reached out to  
15 Plaintiff's counsel on that same date to see if the parties could agree to set aside the default and  
16 secure an extension for a response.

17 5. Parties' counsel thereafter agreed to stipulate to set aside the default and extend the  
18 time to allow Defendant to file an Answer to Plaintiff's Complaint and Errata to Complaint.

19 6. Thus, the Parties hereby stipulate to set aside the Clerk's Entry of Default (ECF No.  
20 13) entered on February 27, 2025. This is the first request to set aside the Default.

21 7. The Parties further stipulate to Dismiss Defendant's pending Motion to Set Aside  
22 Clerk's Entry of Default (ECF No. 14) as moot.

23 8. The Parties further stipulate to extend the deadline to April 4, 2025, for Defendant  
24 to file its Answer.

25 9. This is the first request for an extension of time for Defendant to file its response to  
26 Plaintiff's Complaint.

27 10. This Stipulation is made in good faith and not for the purpose of delay.  
28

11. Nothing in this Stipulation and Order shall operate to waive, relinquish, or impair any claim, defense, objection, or right of any party in this case. Further, nothing in this Stipulation and Order shall be construed as an admission of or consent to the merit or validity of any claim, defense, objection, or right by any party in this case.

Dated this 24<sup>th</sup> day of March, 2025.

HATFIELD & ASSOCIATES, LTD.

JACKSON LEWIS P.C.

/s/ Trevor J. Hatfield

Trevor J. Hatfield, Esq. # 7373  
703 South Eighth Street  
Las Vegas, Nevada 89101

*Attorney for Plaintiff  
Elizabeth Vogt*

/s/ Amanda Patanaphan

Stephen E. Hart, Esq. (*pro hac* pending)  
Texas Bar No. 793911  
Joshua A. Sliker, Esq. #12493  
Amanda Patanaphan, Esq. #15080  
300 South Fourth Street, Suite 900  
Las Vegas, Nevada 8910

*Attorneys for Defendant  
Tapestry (Nevada), Inc.*

**ORDER**

IT IS SO ORDERED.

  
\_\_\_\_\_  
United States District Judge

Dated: March 25, 2025